

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THE NIELSEN COMPANY (US), LLC,)	
)	
Plaintiff,)	
)	C.A. No. 22-1345-CJB
v.)	
)	JURY TRIAL DEMANDED
TVISION INSIGHTS, INC.,)	
)	
Defendant.)	

STIPULATION AND PROPOSED ORDER REGARDING CLAIM CONSTRUCTION

WHEREAS, on October 12, 2022, Plaintiff The Nielsen Company (US), LLC (“Plaintiff”) filed its Complaint (D.I. 1) asserting infringement of United States Patent No. 11,470,243 (“the ‘243 Patent”);

WHEREAS, on January 24, 2023, the Court entered the Scheduling Order (D.I. 17) setting certain dates for determining construction of disputed claim terms; and

WHEREAS, the parties have met and conferred and have agreed not to propose any claim terms for the Court to construe;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties, subject to the approval of the Court:

1. The following dates shall be stricken from the Scheduling Order (as modified by the Stipulation to Extend Time (D.I. 58)):

Event	Date
Prepare joint claim construction chart and file with the Court; concurrent filing of Motion for Claim Construction	October 31, 2023
Plaintiff’s opening claim construction brief	December 11, 2023
Defendant’s answering claim construction brief	January 12, 2024
Plaintiff’s reply claim construction brief	January 31, 2024

Defendant's sur-reply claim construction brief	February 14, 2024
File joint claim construction brief; parties provide optional technology tutorials to the Court; parties notify the Court: (i) whether they request leave to present testimony at claim construction hearing; (ii) the amount of time they request be allocated to them for the hearing; and (iii) the order in which they intend to present the claim terms at issue, including which side will present first for each term	February 21, 2024
Parties provide optional written comments on opposing parties' technology tutorials (seven days after joint claim construction brief)	February 28, 2024
Claim Construction Hearing	March 14, 2024

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IT IS SO ORDERED, this ____ day of _____, 2023.

Honorable Christopher J. Burke
United States Magistrate Judge